REMARKS

Claims 1-12, 16-26 and 31-42 are pending, with claims 1, 16, 23, 31 and 38 being independent. Reconsideration and allowance of the above-referenced application are respectfully requested.

Rejections Under 35 U.S.C. §112

Claims 1, 16, 23, 31 and 38 stand rejected under 35 U.S.C. § 112, second paragraph as allegedly being unclear and vague. This contention is respectfully traversed. One skilled in the art would understand the meaning of "pre-determined reliability requirement" given the original disclosure. For example, Applicants disclose that "The upper layer processing unit 402 processes the **reliable information** to conform it to **transmission requirements** imposed by the mobile application 302." (emphases added; p. 13, paragraph 37 of the application as filed) and "The lower layer processing unit 408 processes information that **does not need to be reliably sent** to the home application 306." (emphases added; p. 14, paragraph 39 of the application as filed).

Further, the Office's interpreting this limitation to mean "TCP/IP" is traversed because such limited reading of the claim language is clearly contrary to what has been disclosed in the

specification. (*See, e.g.*, p. 25, paragraph 70 of the application as filed, which discloses that "**Any protocol that offers reliability** such as TCP, modified forms of TCP, reliable User Datagram Protocol (UDP), reliable layer two links, and other similar protocols can be used in the network configuration 200 and adapted to the described examples. **Reliability** in this context **generally refers to** transparently providing seamless connectivity, e.g., error detection, flow control, packet recovery, bandwidth control, security, etc., even if the interface between the mobile device 202 and the home network 204 changes." (emphases added). Therefore, withdrawal of the rejection of claims 1, 16, 23, 31 and 38 under 35 U.S.C. §112, second paragraph is respectfully requested.

Rejections Under 35 U.S.C. § 103

Claims 1-12, 16-26 and 31-42 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,360,252 issued to Rudy et al. (hereinafter "Rudy") in view of Publication No. 2001/0043615 by Park et al. (hereinafter "Park"). This contention is respectfully traversed.

Initially, Park could not be operatively combined with Rudy. Park relates to **transmitting a video bit stream** using **two logic channels** whereby the **header** of various protocols is **transmitted separately** from the bit stream (*see, e.g.*, [0011] to

[0013]). In sharp contrast, Rudy relates to techniques for avoiding problems in **viewing email attachments** on a mobile device by transferring the attachment to a rendering device (*see, e.g.*, Col. 1, line 64 to Col. 2, line 9). These are wholly different fields of endeavor, and one having ordinary skill in the art would believe that two-channel transmission techniques would be useless in an email-attachment viewing environment such as Rudy.

Even if Rudy and Park can be operatively combined, the Office has not met its initial burdens of establishing a *prima facie* case of obviousness. (*See, e.g.*, MPEP §2143.)

First, there is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to combine the teachings of Rudy and Park. Contrary to the Office's assertion that combining Park with Rudy "would have provided specific function that can preventing [sic] packet loss and bit error between mobile host and home network and reducing a transmission time", the cited portions of Park (paragraphs [0010] and [0032]) fail to suggest a desirability of the hypothetical Rudy-Park combination. Not only is Park's teaching wholly different from Rudy's field of endeavor as discussed earlier; in fact, Park also teaches **away** from the subject matter of this application because Park's teaching of using two logic channels to

separately transmit header and video bit stream is different from "a data stream comprising the first and the second information to be transmitted across the network link" as recited in claim 1.

Even if Park could be combined with Rudy, a *prima facie* case of obviousness has not been established because the hypothetical Rudy-Park combination does not teach or suggest all the claim limitations. For example, contrary to the Office's contention, the portions of Rudy cited by the Office (Fig. 4, Col. 10, lines 42-64, and Col. 1 lines 40-50) do not teach or suggest "**preparing**, at a **first unit** in a source device, first information to be transmitted to a destination across network link with a pre-determined reliability requirement, wherein the **source device comprises a mobile device**, and wherein the **destination comprises a home network**" (emphases added) as recited in claim 1.

In fact, the mobile device in Rudy is not the source device where the information to be transmitted is prepared according to claim 1. (*See, e.g.*, Col. 1, lines 67 to Col. 2 line 4 of Rudy, which states that "the system includes a server machine, and the user's **client machine**, such as a **mobile phone** or PDA. The **server can present** a version of the e-mail item **on the user's client**, including a descriptor of the attachment rather than the entire attachment itself." (emphases added).) Further, Col. 1

lines 40-50 of Rudy actually teaches the undesirability of using the home network as the destination by stating that "The user could view or hear the attachment by finding a regular computer with a modem to connect to the home network and view and hear attachments, but this is often **impractical or impossible**, and is generally an **undesirable complication**." (emphases added). Moreover, Fig. 4 of Rudy merely shows a user's network, a carrier's network, and a provider's network and does not show "destination comprises a home network" as recited in claim 1.

In addition, the portion of Rudy cited by the Office (Col. 7, lines 14-22) does not teach or suggest "**separately preparing**, at a **second processing unit** in the **source device** separate from the first processing unit, **second information** to be transmitted to the destination" (emphases added) as recited in claim 1. In fact, the cited portion is merely a definition of an **email attachment** according to the "Terms and Terminology" section of Rudy. Furthermore, the cited portion speaks nothing of a "second processing unit in the source device" let alone separately processing a second information at a second processing unit in the source device as in claim 1.

Thus, Rudy does not disclose the features of independent claim 1, and Park is neither asserted to show such claimed features nor does it so teach or suggest. Therefore, the hypothetical Rudy-Park combination does not teach or suggest

each and every limitation of claim 1 and claim 1 should be in condition for allowance. Independent claims 16 and 23 recite similar features as claim 1 and are patentably distinguishable over the hypothetical Rudy-Park combination for analogous reasons to those discussed for independent claim 1.

Additionally, contrary to the Office's contention, the portion of Rudy cited by the Office (Col. 7, lines 14-22) does not teach or suggest "**processing reliable information**, wherein the reliable information is configured to require a pre-determined reliability requirement for transmission; **frame** the reliable information; **processing unreliable information**; **frame** the unreliable information" (emphases added) as recited in claim 31. As discussed earlier, Col. 7 lines 14-22 of Rudy is merely a definition of an **email attachment** according to the "Terms and Terminology" section of Rudy. With all due respect, the Office has mistakenly equated an email attachment to the limitations of claim 31. (*See, e.g.*, p. 7, paragraph 22 of the application as filed, which discloses that "**Processing** generally refers to preparing the information for or handling the information after transmission on the active interface 304 according to one or more policies imposed, required, or suggested by the application sending the information, the active interface 304, the mobile device 202, and/or the home network 204. **Examples of processing operations** may include roundtrip and bandwidth optimization,

compression, security (privacy, integrity, etc.), quality of service (QoS), proxy traversal, resistance to connection (interface) loss, reliable handoff of traffic to a new active interface, stream aggregation, and other similar operations." (emphases added); *see also, e.g.*, p. 7, paragraph 21 of the application as filed, which discloses that "**Framing** generally refers to preparing the information for transmission on the active interface 304 using a **particular protocol** by, for example, appending a header to each application fragment included in the information. The header includes reference information for the fragment, e.g., an index number, a fragment size, and other similar information." (emphases added).)

Thus, Rudy does not disclose the features of independent claim 31, and Park is neither asserted to show such claimed features nor does it so teach or suggest. Therefore, the hypothetical Rudy-Park combination does not teach or suggest each and every limitation of claim 31 and claim 31 should be in condition for allowance.

In addition, contrary to the Office's contention, the portion of Rudy cited by the Office (Fig. 13) does not teach or suggest "handling the unreliable information, wherein handling the unreliable information comprises: collecting unreliable information packets; **deframing** the unreliable information packets; and forwarding the unreliable information packets and

control information associated with the unreliable information to a first **destination in the home network**" (emphases added) as recited in claim 38. As discussed earlier, Rudy does not teach or suggest using the home network for viewing email attachments. Further, Fig. 13 of Rudy merely discloses how an intermediary server (IMS) can render an image email attachment at a nearby copy or print shop. Fig. 13 of Rudy speaks nothing of "**deframing** the unreliable information packets; **and forwarding** the unreliable information packets and control information associated with the unreliable information **to** a first destination in **the home network**" as recited in claim 38. (*See, e.g.*, p. 7, paragraph 22 of the application as filed, which discloses that "De-framing generally involves removing any header information and control information from the information.")

Thus, Rudy does not disclose the features of independent claim 38, and Park is neither asserted to show such claimed features nor does it so teach or suggest. Therefore, the hypothetical Rudy-Park combination does not teach or suggest each and every limitation of claim 38 and claim 38 should be in condition for allowance.

Furthermore, claims 2-12, 17-22, 24-26, 32-36, and 39-42 depend generally from independent claims 1, 16, 23, 31, or 38, these dependent claims are patentably distinguishable over Rudy

or Park, either alone or in combination for at least the reasons provided above.

Concluding Comments

It is believed that all of the pending claims have been addressed in this paper. However, failure to address a specific rejection, issue or comment, does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above are not intended to be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Applicants ask that all claims be allowed. Please apply applicable charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: 11/29/06

Cheng C. Ko
Reg. No. 54,227
Attorney for Intel Corporation

Fish & Richardson P.C.
PTO Customer No.:20985
12390 El Camino Real
San Diego, California 92130
(858) 678-5070 telephone
(858) 678-5099 facsimile

10682541.doc